

HARRIS BEACH PLLC
ATTORNEYS AT LAW

December 31, 2019

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KEITH M. CORBETT, ESQ.
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Via ECF

Hon. Gary R. Brown
United States District Court,
Eastern District of New York
100 Federal Plaza
P.O. Box 9014
Central Islip, New York 11722-9014

Re: Joseph Jackson

-v.-

**Nassau County, et. al
18 CV 3007(JS)(GRB)**

Dear Judge Brown:

Our office represents the Defendants, Incorporated Village of Freeport, the Village of Freeport Police Department and individual employees of the Village named as defendants the above subject litigation (the "Village Defendants.")

Pursuant to this Court's Order November 27, 2019, attached please find the supplemental affidavit of the Village Defendants in this matter. Additionally, please be advised that we have provided the Plaintiff's counsel with a service address for Defendant McHale.

At this juncture, the Village Defendants are working expeditiously to ascertain and ensure compliance with the Court's directive to provide additional insurance information by December 31, 2019. As you can imagine, identifying carriers, that have been absolved by other insurance conglomerates, coupled with accessing insurance information from over 25 years ago, is a painstaking and arduous task. In light of the difficulties espoused in this and prior correspondence, and knowing that we are working tirelessly to ensure our client is adequately protected, we are respectfully requesting a 30 day extension to provide the additional insurance information to the Plaintiff in this matter.

As always, I appreciate the court's assistance in this matter. If the Court has any questions, please do not hesitate to contact the undersigned.

HARRIS BEACH PLLC
Attorneys for the Village Defendants

s/
Keith M. Corbett, Esq.
333 Earle Ovington Blvd., Suite 901
Uniondale, New York 11553
(516) 880-8484

HARRIS BEACH ^{PLLC}
ATTORNEYS AT LAW

Enc.

To: All Counsel (Via ECF)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
JOSEPH JACKSON,

Plaintiff,

Case No.: CV-18-1206

NASSAU COUNTY; THE INCORPORATED VILLAGE
OF FREEPORT; DETECTIVE ROBERT DEMPSEY;
DETECTIVE GARY ABBONDANDELO; DETECTIVE
JOHN M. HOLLAND; DETECTIVE MICHAEL HERTS;
DETECTIVE MARTIN ALGER; DETECTIVE
ANTHONY SORRENTINO; DETECTIVE DAVID L.
ZIMMER; POLICE OFFICER MELENDEZ;
LIEUTENANT BURDETT; SERGEANT MCHALE;
SERGEANT NOLL; DETECTIVE SHARKEY; POLICE
OFFICER DOWDELL; POLICE OFFICER BARRY
MCGOVERN; DETECTIVE TURNER; DETECTIVE
EDWARD HAGGERTY; POLICE OFFICER HALL;
DETECTIVE LAURETTE KEMP; DETECTIVE
WILLIAM TWEEDY; DETECTIVE ANTHONY KOSIER;
DETECTIVE SERGEANT DAN SEVERIN; DETECTIVE
JERL MULLEN; THE ESTATE OF DETECTIVE JERL
MULLEN; JOHN DOE, AS THE ADMINISTRATOR OF
THE ESTATE OF JERL MULLEN, and JOHN and JANE
DOE 1 through 20,

AFFIDAVIT

Defendants.

-----X
ROBERT McLAUGHLIN, an attorney duly admitted to practice law before the Courts

of the State of New York, being duly sworn, deposes and says:

1. I am the Deputy Village Attorney for the Incorporated Village of Freeport ("Village").
2. The statements made herein are based on my personal knowledge, unless stated upon information and belief and, as to those statements, I believe them to be true for the reasons stated.

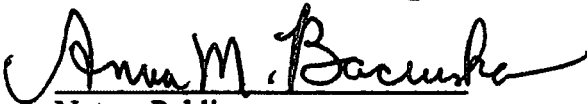
3. Please be advised, that upon receipt of this matter, the Village assigned an independent third-party investigator who performed an investigation into this matter inclusive of identifying witnesses for this matter.

4. On behalf of the Incorporated Village of Freeport, at this juncture, the Village is not aware of known witnesses other than the named defendants who have discoverable information in this matter.

Dated: Uniondale, New York
December 31, 2019


ROBERT McLAUGHLIN, ESQ.

Sworn to before me this
31 day of December, 2019


Notary Public

Anna M. Bacuska
Notary Public, State of New York
No. 01BA6134838
Qualified in Nassau County
Term Expires October 11, 2021